

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the Matter of)	
)	
Proposed Amendments to the Service Rules)	PS Docket No. 13-87
Governing Public Safety Narrowband)	
Operations in the 769-775/799-805 MHz Bands)	
)	
National Public Safety Telecommunications)	RM-11433
Council Petition for Rulemaking on Aircraft)	
Voice Operations at 700 MHz)	
)	
National Public Safety Telecommunications)	RM-11433
Council Petition for Rulemaking to Revise 700)	
MHz Narrowband Channel Plan)	
)	
Region 24 700 MHz Regional Planning)	WT Docket No. 96-86
Committee Petition for Rulemaking)	PS Docket No. 06-229
)	
State of Louisiana Petition for Rulemaking)	RM-11577

Reply Comments of Motorola Solutions, Inc.

Motorola Solutions, Inc. (“Motorola Solutions”), submits these Reply Comments in response to the Further Notice of Proposed Rulemaking in the above-captioned rulemaking.¹ Motorola Solutions urges the Commission to resolve expeditiously the relatively few issues that remain active in this proceeding so that innovative new narrowband products can be offered to public safety agencies.

CAP Compliance. The *Further Notice* seeks comment on recommended feature sets submitted by the Project 25 Compliance Assessment Program Advisory Panel (“Project 25 CAP

¹ *Proposed Amendments to the Service Rules Governing Public Safety Narrowband Operations in the 769-775/799-805 MHz Bands, et al.*, PS Docket 13-87, *et al.*, Order on Reconsideration and Further Notice of Proposed Rulemaking, 81 FR 65984 (2016) (*Further Notice*).

AP”) to better define interoperability for purposes of achieving compliance with Project 25 Compliance Assessment Program CAP compliance.² In its opening comments, Motorola Solutions stated that it has actively engaged in industry discussions to advance a unified position from manufacturers on these proposals and that it “fully supports the comments that are being submitted today by the TIA’s Private Radio Section and urges the Commission to act favorably on those recommendations.”³ In addition to TIA, the P25 CAP AP also addressed this issue and filed comments of similar substance to TIA.⁴ Motorola Solutions urges the Commission to adopt rules consistent with the recommendations of both TIA and the P25 CAP AP.

In its comments, Motorola Solutions again raised the concern that the CAP compliance program requires testing against products from three different manufacturers to demonstrate interoperability.⁵ Absent regulatory flexibility, rigid application of that requirement would threaten to delay the introduction of new products until additional manufacturers produce sufficiently similar technologies, which could become a perverse disincentive for the development of innovative public safety technologies. Motorola Solutions continues to review this issue in light of the recommended changes to the P25 CAP AP proposals and, if necessary, will provide further recommendations in a future pleading for the purpose of minimizing the potential impact of what it is likely an unintended consequence.

² *Id.* at ¶ 36.

³ Comments of Motorola Solutions, Inc., PS Docket No 13-87, *et. al.*, submitted October 26, 2016 at 5 (“Motorola Solutions’ Comments”).

⁴ Comments of the Telecommunications Industry Association, PS Docket No 13-87, *et. al.*, submitted October 26, 2016 (“TIA Comments”); Comments of the Project 25 Compliance Assessment Program Advisory Panel, PS Docket No 13-87, *et. al.*, submitted October 26, 2016.

⁵ Motorola Solutions’ Comments at 4.

Trunking Requirement. Motorola Solutions would like to clarify its position with respect to the Further Notice’s proposal to exempt vehicular repeater systems (VRS) from the mandatory trunking requirement of Section 90.537.⁶ Motorola Solutions supported this proposal and stated that there is “no reason why the policy should not be broadened to cover other low power, mobile-only use.”⁷ Thus, Motorola Solutions recommended that the Commission allow “low-power (5 watts or less), mobile-only operations on more than 5 channels per license without requiring trunking technology on the 700 MHz General Use or State License channels.”⁸

Upon further review, Motorola Solutions would like to revise its comments by removing the reference to a 5 watt threshold. 700 MHz narrowband mobile transmitters, including VRS devices, are commonly authorized to operate with powers exceeding 5 watts and there is no technical reason to differentiate such operations with respect to the required trunking provisions of Section 90.237. The Commission should exempt VRS operations and other mobile-only devices operating on the General Use and State channels from the required trunking requirement when licensed to operate on more than 5 channels.

Motorola Solutions’ Petition for Clarification. The Further Notice sought comment on Motorola Solutions’ Petition for Clarification, which urged the Commission to clarify that only subscriber devices capable of operating on the designated nationwide interoperability channels in conformance with the technical standards contained in Section 90.548 of the Commission’s rules are permitted to operate in the 700 MHz public safety narrowband spectrum.⁹ In the initial comment round, several public safety organizations joined Motorola Solutions in addressing this

⁶ *Id.* at 5, 6.

⁷ *Id.* at 6.

⁸ *Id.*

⁹ *Further Notice* at ¶ 40.

topic. In large measure, these commenters are in substantive agreement with Motorola Solutions' interpretations of the relevant rules.

APCO expressed its view that “all narrowband mobile and portable 700 MHz band public safety radios must be capable of operating on all of the narrowband interoperability channels using the standards specified in Section 90.548 regardless of the technology used for communications on non-interoperability channels and as a baseline function of the device as offered. In other words, there should not be any additional software, firmware, hardware, or technology changes required.”¹⁰

APCO's comments were echoed by the National Regional Planning Council, which stated that it “supports the idea that radios designed to operate in the 700 MHz narrowband spectrum, be capable of communicating on the interoperability channels using the digital standards specified in rule 90.548 regardless of the digital technology used by that radio on the non-interoperability channels.”¹¹ NRPC further stated that “recommends clarifying rule 90.547 to require that radios must be capable of operating on all of the designated nationwide narrowband Interoperability channels pursuant to the standards specified in rule 90.548 without requiring any additional software, firmware, hardware, or modification.”¹²

¹⁰ Comments of APCO, PS Docket No. 13-87, *et. al.*, submitted October 26, 2016 at 4.

¹¹ Comments of the National Regional Planning Council, PS Docket No 13-87, *et. al.*, submitted October 26, 2016, at 3.

¹² *Id.*

Similarly, the California Governor's Office of Emergency Services agreed that:¹³

[R]adios designed to operate in the 700 MHz narrowband spectrum must be capable of operating on the interoperability channels. They must be compliant with the requirements of rule 90.548 defining the technology standards to be used on the interoperability channels. Further, Cal OES recommends that radios have this functionality as a standard function of the radio as manufactured. The capability should not be an optional feature or capability that must be requested at the time of order.

Fundamentally, Motorola Solutions believes that radios configured to operate on the 700 MHz narrowband frequencies must be capable of allowing users to communicate on the 700 MHz interoperability channels using the standard operating modes proscribed in Section 90.548 regardless of the technology used for communications on the General Use or State channels. To this end, Motorola Solutions finds itself in agreement with the views expressed by APCO, NRPC and CAL OES. Motorola Solutions urges the Commission to proceed expeditiously and issue the requested clarification consistent with the established record.

Respectfully submitted,

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¹³ Comments of the California Governor's Office of Emergency Services, PS Docket No. 13-87, *et. al.*, submitted October 26, 2016 at 3.